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To: Nancy Rumrill/R9/USEPA/US|||EPA
Date: 06/09/2009 05:24 PM
Subject: Testimony on Lahaina WWRF Permit

Additional testimony for TO ISSUE AN UNDERGROUND INJECTION CONTROL
(UIC) PERMIT
FOR THE LAHAINA WASTEWATER RECLAMATION FACILITY

June 9, 2009

Summary: I recommend 1] to reduce the use of injection wells and recommend that 2] that the waste water is treated to R-1 and reused for irrigation at resorts, to prevent fires on fallow fields and for other uses; and 3] monitor the use of waste water to prevent bacterial or viral break out. My testimony below supports these recommendations.

Maui County has a Reuse program in place.

Maui County's water reuse program was recognized for its commitment to sustainable practices in 2008, by the Hawaii Home & Remodeling Who's Keeping Hawaii Green? program.

Approximately 1.2 billion gallons of recycled water was reused resulting in potable water savings of more than four hundred (400) million gallons in 2008. Approximately 22% of the water from the WWRD's wastewater reclamation facilities is currently reused. Recycled water from our facilities is used for a number of purposes including landscape irrigation, agricultural irrigation, construction, cooling, fire control, toilet flushing and composting. Approximately 1 mgd of treated wastewater is reclaimed to R-1 quality, pursuant to Hawaii State Regulations § 11-62-26, by the addition of ultraviolet disinfection. Reclaimed water to R-1 quality means that it is treated to sufficiently filter and disinfect the wastewater of bacteria and viruses for it to be used safely to water areas frequented by people (such as lawns, parks, and golf courses). This reclaimed wastewater is reused at the plant and distributed to a nearby golf course, pineapple company, and to construction contractors. The reuse of R-1 waste water is less expensive than potable water. The users [resorts, developers etc] can pay for treated R-1 wastewater so the County can recoup their expenses.

In a letter dated Feb 12, 2007, Alexis Strauss, director for the EPA Pacific Southwest Region's Water Division. "Throughout the [Hawaiian]

islands, it's vital that wastewater systems be closely monitored, and very well-maintained, to and very well-maintained, to prevent sewage spills to Hawaii's streams and ocean waters." In addition a monitoring system can be implemented to assure no bacterial growth is occurring from the waste water.

The 2010 Maui County budget allocates \$38,505,204 and follows investments of \$45,840,000 in the past two years for replacing wastewater lines, upgrading and improving the efficiency of waste treatment facilities including pump stations.

In the West Maui region, developers of North Beach are progressing on a plan to design and construct improvements to expand the County's recycled water production and transmission systems. These improvements will include storage, disinfection and distribution upgrades to the Lahaina Wastewater Reclamation Facility, and make R-1 water available to the North Beach area as well as other commercial properties in the adjacent Kaanapali resort area. Completion of this project is expected by 2010.

It is the North Beach resorts that will benefit from using the waste water. By reducing the amount of injected wastewater to 1 mgd or less, will benefit the Maui County Reuse program, the users of waste water and the near shore water.

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